

1 THE HONORABLE BARBARA J. ROTHSTEIN

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6 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

7
8 RICHARD HALPERN on behalf of himself and all
9 others similarly situated,

10 Plaintiff,

11 v.

12 T-MOBILE USA, INC.,

13 Defendant.
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No. 2:21-cv-01226-BJR

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER
COMPLAINT**

STIPULATION AND ORDER TO EXTEND
TIME TO ANSWER COMPLAINT (No. 2:21-
cv-01226-BJR) - 1

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1 Pursuant to Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiff
2 Richard Halpern, and Defendant T-Mobile USA, Inc., (“the Parties”), stipulate that T-Mobile’s
3 deadline to answer or otherwise respond to the Complaint in the above-captioned action is
4 extended for a total of 60 days, through December 6, 2021.¹

5 Good cause exists for this extension, as there is a pending motion before the Judicial Panel
6 on Multidistrict Litigation (“JPML”) regarding transfer and coordination or consolidation of
7 related cases for pretrial proceedings under 28 U.S.C. § 1407. *See In re T-Mobile Customer Data*
8 *Sec. Breach Litig.*, MDL Docket No. 3019 (J.P.M.L. filed Aug. 23, 2021) (ECF No. 1). The
9 plaintiffs in a related case, *Daruwalla v. T-Mobile USA, Inc.*, No. 2:21-cv-1118 (W.D. Wash. filed
10 Aug. 19, 2021), filed the transfer motion and identified this case, and numerous others, as related
11 cases that should be transferred. *In re T-Mobile.*, MDL Docket No. 3019 (ECF Nos. 1, 2, 8-1, 11,
12 20, 48, 62). The additional 60 days will conserve judicial resources by allowing T-Mobile to assess
13 the pending JPML motion and continue discussions with Plaintiff’s counsel here and counsel in
14 the related cases before responding to Plaintiff’s Complaint.

15 Dated: September 27, 2021

16 By: /s/ Steve Y. Koh

17 Steve Y. Koh, WSBA No. 23284

18 Kathleen M. O’Sullivan, WSBA No. 27850

19 Lauren J. Tsuji, WSBA No. 55839

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STIPULATION AND ORDER TO EXTEND
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1 **ORDER**

2 IT IS SO ORDERED.

3 Dated this 28th day of September 2021.

4
5 s/Barbara J. Rothstein

6 Barbara J. Rothstein
U.S. District Court Judge

7 Presented by:

8 /s/ Steve Y. Koh

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